

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

STATE OF MARYLAND; STATE OF
DELAWARE; STATE OF CALIFORNIA; STATE
OF COLORADO; STATE OF ARIZONA; STATE
OF CONNECTICUT; DISTRICT OF COLUMBIA,
STATE OF HAWAII; STATE OF ILLINOIS;
OFFICE OF THE GOVERNOR *ex rel.* Andy
Beshear, in his official capacity as Governor of the
COMMONWEALTH OF KENTUCKY; STATE OF
MAINE; COMMONWEALTH OF
MASSACHUSETTS; PEOPLE OF THE STATE OF
MICHIGAN; STATE OF MINNESOTA; STATE OF
NEVADA; STATE OF NEW JERSEY; STATE OF
NEW MEXICO; STATE OF NEW YORK; STATE
OF NORTH CAROLINA; STATE OF OREGON;
JOSH SHAPIRO, in his official capacity as
Governor of the COMMONWEALTH OF
PENNSYLVANIA; STATE OF RHODE ISLAND;
STATE OF VERMONT; STATE OF
WASHINGTON; STATE OF WISCONSIN;

Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, operating as
AmeriCorps; and JENNIFER BASTRESS
TAHMASEBI, in her official capacity as Interim
Head of the Corporation for National and
Community Service;

Defendants.

Civ. No. 25-cv-01363 (DLB)

DECLARATION OF JACQUELINE M. LUCIER

Pursuant to 28 U.S.C. § 1746, I, Jacqueline M. Lucier, hereby declare as follows:

1. I am a resident of the State of Connecticut. I am over the age of 18 and have personal knowledge of all the facts stated herein, including as based on my experience and information provided to me. If called as a witness, I could and would testify competently to the matters set forth below.

2. I am currently employed by the Office of Higher Education as a Division Director, Programs & Student Services.

3. The Office of Higher Education manages the funds received from the Corporation for National and Community Service (AmeriCorps), as authorized by the National and Community Service Act of 1990, as amended (42 U.S.C. §12501 et seq.).

4. As the Division Director, Program & Student Services, I am the Executive Director of the Connecticut Commission on Community Service (Serve Connecticut) and oversee the federal grants received from the Corporation for National and Community Service (AmeriCorps).

5. The Connecticut Commission on Community Service (known alternatively as Serve Connecticut) was established in 1993 by Executive Order to encourage community service and volunteer participation as a means of community and state problem-solving; to promote and support voluntary citizen involvement in government and private programs throughout the State; to develop a long-term, comprehensive vision and plan for action for community service initiatives in Connecticut; and to serve as the State's liaison to national and state organizations which support its mission.

6. Serve Connecticut receives and manages grant funds from AmeriCorps, awards and disburses subgrants, monitors subgrantees for performance and compliance with grant

requirements, provides training and technical assistance for subgrantees, and functions as a liaison between AmeriCorps and subgrantees.

7. As of the 2024 program year, AmeriCorps engaged 2,255 members and volunteers across 253 service locations throughout Connecticut, contributing to a total investment of \$12.4 million in the state. Locally, AmeriCorps programs secured over \$2.9 million in external funding from businesses, foundations, public agencies, and other sources across Connecticut. This local investment amplified community impact and enhanced the value of taxpayer contributions.

8. AmeriCorps programs in Connecticut address critical community needs through various initiatives:

- **Education:** Members support early childhood education, literacy programs, and college readiness initiatives.
- **Public Health:** Volunteers engage in health education, nutrition assistance, and mental health support services.
- **Economic Opportunity:** Programs focus on workforce development, financial literacy, and housing assistance.
- **Disaster Services:** Members assist in disaster preparedness, response, and recovery efforts.
- **Environmental Stewardship:** Initiatives include conservation projects and environmental education.
- **Veterans and Military Families:** AmeriCorps Seniors organizes and manages Veterans Coffeehouses across the state. These gatherings offer veterans and their families a welcoming environment to connect, share experiences, and access essential resources.

9. After successfully completing service, AmeriCorps members earn a Segal AmeriCorps Education Award to pay for qualified educational costs. Since 1994, more than 17,000

Connecticut residents have served approximately 25 million hours and earned education awards totaling more than \$63.3 million. Higher education institutions and other organizations in Connecticut have received more than \$18.9 million in education awards since 1994.

10. At the completion of the 2024-2025 program year, AmeriCorps members were expected to earn \$1,179,650 in Segal AmeriCorps Education Awards, which can be used to pay qualified student loans or tuition at eligible institutions. However, with the termination of these grants, AmeriCorps members will no longer qualify for their full education award; they will be terminated from the program and receive a prorated education award.

11. AmeriCorps has supported Connecticut since its inception. The impact of AmeriCorps funding (AmeriCorps State & National, AmeriCorps NCCC, AmeriCorps VISTA and AmeriCorps Seniors) in Connecticut over the last decade (2015-2025) is as follows:

Year	Members	Education Awards	Programs Funding	Total CNCS Funding	Local Support	Total AmeriCorps Support
2015	3348	\$3,374,264	\$8,237,050	\$11,611,314	\$6,059,682	\$17,670,996
2016	2702	\$2,891,894	\$7,942,071	\$10,833,965	\$13,788,194	\$24,622,159
2017	1877	\$2,662,116	\$7,687,280	\$10,349,396	\$6,249,851	\$16,599,247
2018	2107	\$2,586,294	\$7,335,566	\$9,921,860	\$6,390,902	\$16,312,762
2019	1989	\$2,452,722	\$7,481,088	\$9,933,810	\$5,717,397	\$15,651,207
2020	1124	\$2,062,138	\$6,210,171	\$8,272,309	\$4,872,309	\$13,144,618
2021	2111	\$2,109,814	\$8,568,570	\$10,678,384	\$2,951,817	\$13,630,201
2022	1946	\$1,657,963	\$7,872,651	\$9,530,614	\$2,744,048	\$12,274,662
2023	2406	\$1,520,272	\$8,141,193	\$9,661,465	\$3,125,551	\$12,787,016
2024	1809	\$3,876,882	\$17,227,527	\$21,104,409	\$8,394,438	\$29,498,847
2025	2255	\$1,425,879	\$7,917,027	\$9,342,906	\$3,086,196	\$12,429,102
TOTALS	23674	\$26,620,238	\$94,620,194	\$121,240,432	\$63,380,385	\$184,620,817

12. On or about April 16, 2025, I learned from Rich Smith, Deputy Region Director for Programming, AmeriCorps NCCC Southern Region, that all members of AmeriCorps' National Civilian Community Corps (NCCC) program had been placed on administrative hold status

effective immediately and would be eligible for a “compelling personal circumstance” program exit on April 30. The stated reason was: “In alignment with the Trump-Vance administration priorities and Executive Order 14,222 ‘Implementing the President’s Department of Government Efficiency Cost Efficiency Initiative,’ AmeriCorps NCCC is working within new operational parameters that impact the program’s ability to sustain program operations.”

13. The next day, I learned from America’s Service Commissions (ASC) that the Corporation for National and Community Service, the AmeriCorps federal agency, placed approximately 85% of its federal staff on paid administrative leave, leaving only a small crew in each department.

14. The reduction in staffing will result in delays in the agency’s review of competitive grant applications and approval of formula applications, jeopardizing Serve Connecticut’s receipt of funds and implementation of programs for future fiscal years, including the execution of projects scheduled to commence on August 1, 2025.

15. On or about 7:30 p.m. on Friday, April 25, 2025, I received an email (“Termination Notice”) from AmeriCorps, stating that, effective immediately, the AmeriCorps award subrecipients included in an attached spreadsheet were being terminated “per 2 CFR 200.340(a)(4) because it has been determined that the award no longer effectuates agency priorities. You must immediately cease all award activities. This is a final agency action and is not administratively appealable.” The termination notices related to the following grants: Formula grants (\$2,726,150); Competitive grants (\$405,000); Planning grants (\$148,862); Fixed Amount grants (\$567,000); Placeholder grants (\$392,078); collectively “Affected Grants” (\$4,239,090).

16. The list of terminated AmeriCorps programs includes Serve Connecticut’s entire AmeriCorps subgrantee portfolio for 2024-2025.

17. The terminated grants funded 349 members based at seven nonprofits and supported 55 community-based host sites throughout the state. Detailed information about the terminated active grants is below.

Name of Program	Number of Members	Obligated Funds	Remaining Funds
New England Science & Sailing Foundation	10	\$270,000	\$168,997.29
Health 360, Inc.	11	\$297,000	\$99,967.50
Catalyst CT, Inc., Prevention Corps	34	\$414,845	\$155,212.72
Campus Compact, College Renaissance Corps	25	\$472,492	\$472,492.00
Campus Compact, Climate Action Corps	40	\$461,143	\$396,661.15
Community Health Center, Incorporated	15	\$405,000	\$218,480.36
Jumpstart for Young Children, Inc.	184	\$683,929	\$101,186.45
Public Allies, Inc.	30	\$693,741	\$447,530.65
Catalyst CT, Inc., Fairfield Public School	0	\$74,759	\$34,016.39
Connecticut Rise Network	0	\$74,103	\$19,237.67
Office of Higher Education	0	\$392,078	\$392,078.00
Totals	349	\$4,239,090	\$2,505,860.18

18. Impacted AmeriCorps Connecticut program and planning grant subgrantees operate on one-year performance periods that range from August 1, 2024, to July 31, 2025, September 1, 2024, to August 31, 2025, or October 1, 2024, to September 30, 2025.

19. The termination notification from AmeriCorps, received on Friday, April 25, 2025, unexpectedly and abruptly paused activities of seven operational programs, two planning grants, and AmeriCorps members serving at 55 service sites across Connecticut.

20. **Jumpstart Connecticut** has been a high-performing, compliant program in Serve Connecticut's funding portfolio for 13 years, engaging up to 184 AmeriCorps members yearly in

semester-long service commitments at early childhood learning centers in underserved communities.

21. At the time of Serve Connecticut's receipt of the AmeriCorps termination notice, 126 Jumpstart AmeriCorps members were within two weeks of completing their 300-hour service terms and earning the full amount of their pro-rated Eli Segal Education Award of \$1,565. These AmeriCorps members have been compelled to abruptly pause the key classroom support they provide teachers at 14 early childhood centers. This has also disrupted the members' relationships with the children they serve.

22. **Public Allies Connecticut** is another high-performing and compliant program in Serve Connecticut's funding portfolio with a 13-year track record of providing Connecticut nonprofits with much-needed support in enhancing the efficiency, effectiveness, and reach of their programming.

23. At the time of Serve Connecticut's receipt of the AmeriCorps termination notice, it had 12 AmeriCorps members, i.e., "Allies," engaged in service at 11 nonprofits, which each invested a \$23,500 host site service fee to receive this much-needed capacity support that is now at risk of being truncated. Further, this premier apprenticeship-modeled national service program has been compelled to pause providing its robust weekly professional development curriculum to its AmeriCorps members to support their post-service careers.

24. **Healthy Communities** has been a stellar recent addition to the Serve Connecticut funding portfolio as a Public Health AmeriCorps funding initiative. Healthy Communities is in its third year of operation and has had an outstanding performance and compliance track record, which is marked for a new AmeriCorps program.

25. With 11 AmeriCorps members serving in federally qualified health centers as patient health literacy and care coordination providers, this program has served 469 unique patients as of its recently submitted mid-year reporting, representing 95% progress on its targets for the year. In addition to the critical support Healthy Communities provides patients, the program is a conduit for AmeriCorps members interested in health careers. AmeriCorps members have been compelled to pause their service. They are at risk of being unable to earn the full amount of the \$7,395 Eli Segal Education Award, many of whom are counting on it to pay student loans and/or to put toward post-secondary health education.

26. Campus Compact **EnviroCorps Connecticut** is Serve Connecticut's newest AmeriCorps program, launching its inaugural year after completing a prior funding year as a Serve Connecticut planning subgrantee.

27. The program has had a strong year-one launch, engaging 12 AmeriCorps members at six universities, community colleges, and environmental stewardship organization service sites in supporting energy efficiency, nature conservation, and community education around ecological stewardship. The unanticipated interruption in program activities caused by the AmeriCorps termination notification risks hindering this new program's momentum in generating future service site partnerships and recruiting new AmeriCorps members.

28. Also impacted are two current AmeriCorps Connecticut planning grant subgrantees who are in the midst of developing promising AmeriCorps program concepts that are directly responsive to a key state priority—re-engaging disconnected youth in Connecticut. CT RISE Network and Catalyst CT are both developing concepts that leverage a national service strategy toward key recommendations provided in a pivotal 2023 report, Connecticut's Unspoken Crisis: Getting People Back on Track—A Study of Connecticut's At-Risk and Disconnected Young

People (Dalio Education and BCG), which revealed the needs and opportunities facing Connecticut's disconnected young people aged 14 to 26.

29. Serve Connecticut is proud of its robust, year-long planning grant program, which supports subgrantees in developing an AmeriCorps State program concept into a full application for AmeriCorps State Formula funding and preparing to launch program operations in the event of receipt of operational funding. The unanticipated interruption in the planning grant curriculum caused by the AmeriCorps termination notification risks the potential launch of these concepts as operational programs.

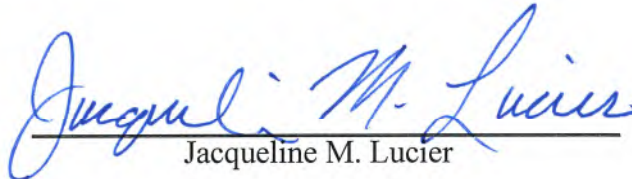
30. AmeriCorps Connecticut program performance periods begin August 1, September 1, or October 1 of the funding year. As such, current and prospective AmeriCorps Connecticut subgrantees planning for the 2025-2026 program year are currently beginning to launch their AmeriCorps members and, as applicable, host site recruitment activities, contingent on federal appropriations and AmeriCorps Notices of Grant Award, which under normal circumstances would be expected to be received in July 2025. The termination notification from AmeriCorps, received on Friday, April 25, 2025, has injected considerable uncertainty into how subgrantees approach messaging to potential AmeriCorps member candidates and existing and potential organizational partners.

31. AmeriCorps programs are vital lifelines for communities across Connecticut. Postponing the start of and terminating these programs will not only disrupt services to elementary and secondary schools, early childhood centers, food banks, community youth centers, safe havens for domestic violence victims, community health centers, and other community outlets, but it will also adversely affect the AmeriCorps members and communities who rely on timely engagement

and support. The ripple effect of these delays could undermine community resilience and erode the trust and benefits built over years of service collaboration.

32. Life without AmeriCorps in Connecticut means veterans in Groton losing vital daily support, students missing out on safe afterschool programs, young adults losing a pathway into public service, and the absence of low-income Americans aged 55 and older providing one-on-one mentoring and academic support to children with exceptional needs. With programs terminated and frozen, and AmeriCorps dismantled, the ripple effect will cause our most vulnerable residents to suffer and will undermine the civic fabric that holds them together.

I declare under penalty of perjury under the laws of the United States that, to the best of my knowledge, the foregoing is true and correct. Executed on May 5, 2025, at Hartford, Connecticut.


Jacqueline M. Lucier